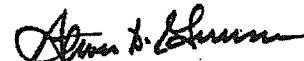


## **EXHIBIT 2**

## **EXHIBIT 2**

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CLERK OF THE COURT

1 JAMES P. KEMP, ESQ.  
Nevada Bar No.: 6375  
2 VICTORIA L. NEAL, ESQ.  
Nevada Bar No.: 13382  
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7 *Attorneys for Plaintiff*

8 **DISTRICT COURT**  
9 **CLARK COUNTY, NEVADA**

\*\*\*

10 KELLY M. STARK,

11 Plaintiff,

12 vs.

13 GNLV CORP., a Domestic Corporation,  
14 D/B/A/ GOLDEN NUGGET LAS VEGAS,

15 Defendants.

Case No.: A-15-719948-C

Dept No.: XXVIII

**COMPLAINT**

**JURY TRIAL DEMANDED**

Arbitration Exemption: action seeking  
equitable or extraordinary relief.

16 COMES NOW Plaintiff, KELLY M. STARK, by and through Counsel of Record, KEMP  
17 & KEMP, ATTORNEYS AT LAW, and for a cause of action does hereby state and allege as  
18 follows:  
19  
20  
21

**JURISDICTION**

- 22  
23 1. This is a civil action for damages brought by KELLY M. STARK against her former employer,  
24 GNLV CORP. to redress discrimination and retaliation under Title VII of the 1964 Civil  
25 Rights Act, as amended by the 1991 Civil Rights Act, 42 U.S.C §12101 *et seq.*, the Americans  
26 With Disabilities Act of 1993 (herein "ADA"), as those Acts have been amended from time to  
27  
28

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1 time. KELLY M. STARK brings additional claims for retaliation and interference by her  
 2 former employer, GNLV CORP., in violation of the Family and Medical Leave Act of 1993  
 3 (herein "FMLA"), as amended, 29 U.S.C. § 2601 *et seq.*

4 2. KELLY M. STARK was issued a Notice of Right to Sue by the United States Equal  
 5 Employment Opportunity Commission on March 19, 2015.

6 3. KELLY M. STARK has fully complied with all prerequisites under Title VII, the ADA and the  
 7 FMLA to pursue these claims in this Court.

8 4. This action has been timely filed as to all claims.

#### 10 PARTIES

11 5. KELLY M. STARK (herein "Plaintiff"), is a resident of Clark County, Nevada.

12 6. GNLV CORP., D/B/A/ GOLDEN NUGGET LAS VEGAS (herein "Defendant"), is a  
 13 domestic corporation registered with the Nevada Secretary of State.

14 7. Defendant has continuous and ongoing business operations in the state of Nevada and Clark  
 15 County, and engages in an industry affecting commerce. Upon information and belief,  
 16 Defendant employed more than 500 employees in the two calendar years preceding the events  
 17 in question. Defendant's principal place of business is located in Las Vegas, NV.

18 8. Defendant, as a corporation, can only operate by and through its agents, directors, officers,  
 19 managers, supervisors, and employees. Therefore, wherever the identifying word Defendant is  
 20 used, it encompasses actions by and through its agents, directors, officers, managers,  
 21 supervisors, and employees.

22 9. Plaintiff is unaware of the true names and capacities whether individuals, corporations,  
 23 associates, or otherwise of Defendants DOE INDIVIDUALS I through X and ROE  
 24 BUSINESS ENTITIES I through X, inclusive, and therefore sues these Defendants by such  
 25 fictitious names. Plaintiff is informed and believes and thereupon alleges that the  
 26  
 27  
 28

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1 Defendants, and each of them, are in some manner responsible and liable for the acts and  
 2 damages alleged in this Complaint. Plaintiff will seek leave of this Court to amend this  
 3 Complaint to allege the true names and capacities of the DOE INDIVIDUAL and ROE  
 4 CORPORATION Defendants when the true names of the DOE INDIVIDUAL and ROE  
 5 CORPORATION Defendants are ascertained.

6  
 7 **ALLEGATIONS COMMON TO ALL CLAIMS**

- 8 10. Plaintiff was hired by Defendant as a Table Games Dealer on October 15, 1998. At all times  
 9 herein, Plaintiff performed at or above the reasonable expectations of Defendant to include  
 10 earning a position as a blackjack dealer in Defendant's "high limit" gaming pit - a position  
 11 reserved for only the best dealers. On June 7, 2013, Plaintiff's termination was effectuated  
 12 after she experienced a medical episode directly linked to her disability while on duty on May  
 13 24, 2013.
- 14 11. In approximately 2011, Plaintiff was diagnosed with hyperthyroidism. By way of  
 15 background, the thyroid gland regulates every aspect of a person's metabolism thereby  
 16 dictating the actions and reactions of *every* organ and system within the human body. This is  
 17 done through the production of a hormone produced exclusively by the thyroid. Left  
 18 undiagnosed, misdiagnosed or mistreated, hyperthyroidism can lead to permanent damage to  
 19 any one of the body's organs and systems, and to death.
- 20 12. The treatments for hyperthyroidism include radioactive iodine therapy (herein "RAI"),  
 21 aimed at disabling or killing the gland completely, or surgery to remove the gland. Either  
 22 procedure leads to a decreased or totally non-functioning gland. After those procedures,  
 23 approximately 90% of patients are diagnosed as having hypothyroidism. Hypothyroidism is  
 24 a chronic insidious disease that can be managed by daily medication, but which does not  
 25 preclude unannounced episodic reoccurrences of symptoms affecting the quality of the  
 26  
 27  
 28

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1 patient's life. Symptoms of **hypothyroidism** include, but are not limited to, neuronal  
2 excitability, body temperature control (getting excessively hot or cold), sensory impairments,  
3 exaggerated sensitivities to smells and tastes, slowness of thought and action, changes of  
4 speech, headaches, sleep disturbances, confusion up to delusions and hallucinations,  
5 impairments of memory and mental acuity ("brain fog"), of vision, as well as of hearing.  
6 Further, the psychiatric disturbances which accompany **hyperthyroidism** and  
7 **hypothyroidism** mimic mental illness. Patients may exhibit paranoia-like fear, marked anxiety  
8 and tension, emotional lability, impatience and irritability, and distractible over-activity.  
9

10 13. Under the ADA, thyroid gland disorders are a covered disability.

11 14. Plaintiff sought treatment for her **hyperthyroidism** undergoing two (2) rounds of RAI  
12 therapy. When the RAI therapy failed to correct the **hyperthyroidism** Plaintiff underwent  
13 surgery to have the gland completely removed. Having no thyroid gland caused Plaintiff be  
14 diagnosed with **hypothyroidism** and she was prescribed a thyroid replacement hormone as a  
15 measure to control her **hypothyroidism**. As with any hormone replacement therapy, it is  
16 often trial by error and usually requires an expansive amount of time, often years, to ascertain  
17 the correct replacement therapy and dosage needed to regulate and manage the thyroid gland  
18 disorder. Additionally, replacement therapy requires regular testing to insure that the therapy  
19 is achieving optimum results and control of the symptoms. Even with astute and diligent  
20 monitoring, patients can experience the reoccurrence of symptoms. This is exactly what  
21 happened to Plaintiff.  
22

23 15. Plaintiff's thyroid surgery occurred on July 19, 2012. She applied for and was granted leave  
24 under the FMLA effective as of July 19, 2012, specifically because of her thyroid gland  
25 disorder. Plaintiff returned to full-duty on August 2, 2012.  
26  
27  
28

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- 1 16. On January 14, 2013, Plaintiff's doctor wrote a note which stated that Plaintiff was being  
2 seen by him "for adrenal fatigue, hypothyroidism, hormone insufficiency, and insomnia."  
3 The doctor further stated the he hoped the "letter will serve to document the patient's  
4 medical diagnosis...".
- 5 17. On May 24, 2013, Plaintiff would experience a severe reoccurrence of her hypothyroid  
6 symptoms. On that day, Plaintiff had two "regular" players at her "high limit" table, a mother  
7 and son. Plaintiff had known both the mother and son since 1998 and had developed a  
8 friendly rapport with each. Because of their longstanding relationship, it was not unusual for  
9 Plaintiff and the mother and son to joke, exchange stories about their lives, and generally  
10 enjoy each other's company with engaging in gaming activities. On this particular occasion,  
11 Plaintiff was taken aback by the amount of perfume the mother was wearing – a perfume the  
12 customer had worn many times before and which had not affected Plaintiff. However, on  
13 this occasion, the customer's perfume was overwhelming and even though it was beginning  
14 to bother her, Plaintiff joked with the players about it. Nonetheless, within a short period of  
15 time, the overwhelming perfume odor triggered a strong chain reaction of physical and  
16 mental symptoms within Plaintiff. The reaction to the perfume, and the resulting physical  
17 and mental symptoms, are directly related and attributed to Plaintiff's thyroid gland disability.
- 18 18. First, Plaintiff's body reacted to the strong perfume odor by getting hot leading to her to  
19 panic and to an overwhelming feeling of anxiety. She backed away from the table to catch a  
20 breath and to try and stabilize the symptoms. She would return to the table, but the chain  
21 reaction continued.
- 22 19. Plaintiff's anxiety grew as the situation became more unmanageable for her. The stress of the  
23 situation triggered Plaintiff's cognitive reasoning and functioning capabilities to be  
24 compromised. This condition is sometimes referred to as "brain fog" wherein the stress of a  
25  
26  
27  
28

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1 situation can cause the brain's neurotransmitters to misfire. "Brain fog" is a common  
2 symptom of hypothyroidism. Plaintiff was not able to "configure her thoughts" and became  
3 "confused," and, as a result, has trouble recalling portions of the events or is "foggy" in her  
4 recollection.

5  
6 20. Jovalyn Del Rosaio (herein "Del Rosario"), Plaintiff's immediate supervisor during that shift,  
7 noticed the incident and moved Plaintiff to another gaming table; however, the table was still  
8 in the immediate vicinity of the odor. By this time, Plaintiff's body was in full attack mode –  
9 attacking itself. Plaintiff felt cornered and her body's natural "fight or flight" instinct kicked  
10 in. In one form or another, Plaintiff repeatedly relayed to Defendant that she could not  
11 handle the perfume odor, that it was choking her.

12  
13 21. Bryan Daigneault (herein "Daigneault") was notified of the situation by Del Rosario and  
14 approached Plaintiff to asked if she needed to be removed from the pit. Plaintiff replied  
15 "yes." After being removed, Plaintiff, still in a state of hyper-vigilance, tried to explain to  
16 Daigneault her thyroid condition and the effects of the perfume on her.

17  
18 22. After Plaintiff was removed from the situation and allowed to take a break, she was able to  
19 calm her body's reactions enough to finish her shift, but not enough to feel completely  
20 "recovered" from the stress of the situation on her body and mind.

21  
22 23. Even before Defendant was notified by Plaintiff of her disability, in the form of her thyroid  
23 gland disorder on the day of the incident, Defendant was aware of Plaintiff's disability.  
24 Defendant had approved Plaintiff's leave under the FMLA and knew she had had surgery to  
25 remove her thyroid. In addition, Plaintiff's shift boss, Judy Watson (herein "Watson"), who  
26 was present the day of the incident, had referred Plaintiff to her endocrinologist, who was  
27 also treating Watson for a similar condition. Finally, Defendant was provided a letter from  
28 Plaintiff's doctor, dated January 14, 2013, explaining Plaintiff medical disabilities. These facts



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1 are more than enough to have been considered a request for an accommodation under the  
2 ADA.

3 24. Plaintiff was suspended pending investigation on May 26, 2013. On May 29, 2013,  
4 Defendant held a due process meeting wherein Plaintiff repeatedly explained the chain of  
5 events, explained her thyroid gland disorder again, explained the effects of the disease again,  
6 and explained how during the incident she had become overheated, confused, and filled with  
7 anxiety. This is more than enough to be considered a request for an accommodation under  
8 the ADA.  
9

10 25. Plaintiff was a model and valued employee for 15 years who had never received discipline for  
11 behavior even remotely like that described above. Defendant knew this behavior to be out of  
12 character for Plaintiff yet, despite having complete knowledge of Plaintiff's disability and  
13 instead of addressing her need for an accommodation under the ADA, Defendant chose to  
14 terminate her.  
15

16 26. Plaintiff also had leave available under the FMLA, but Defendant, even though knowing this  
17 to be true, did not suggest to Plaintiff that she leave the floor and/or take time off to  
18 ascertain what had caused her reaction to the perfume and/or to seek medical attention.  
19 Instead, Del Rosario immediately placed Plaintiff back in service only moving her a short  
20 distance from the odor, but still well within Plaintiff's olfactory range. Del Rosario would be  
21 terminated for not handling the situation properly.  
22

23 27. Immediately after the incident Plaintiff was visibly confused, anxious, demonstrating reduced  
24 cognitive functioning, and acting completely out of character. Defendant should have  
25 suggested Plaintiff exercise her right to leave under the FMLA, as Plaintiff was not in any  
26 condition to request leave on her own behalf at that time.  
27

28 ...



**FIRST CAUSE OF ACTION:  
DISCRIMINATION AND RETALIATION IN VIOLATION OF THE  
AMERICANS WITH DISABILITIES ACT OF 1990,  
42 U.S.C. § 12101 *ET SEQ.***

28. Plaintiff repeats and re-alleges each and every pertinent allegation contained in and every other pertinent paragraph contained in this Complaint, as if set forth fully herein.
29. As fully detailed herein, Plaintiff is a person with a disability pursuant the Americans with Disabilities Act of 1990, as amended in January 2009.
30. As fully detailed herein, Plaintiff was qualified for her job and capable of performing the essential functions of the job with or without a reasonable accommodation.
31. As fully detailed herein, Plaintiff was regarded as being disabled by Defendant.
32. As fully detailed herein, Plaintiff's disability was the sole or motivating factor in Defendant's decision to terminate Plaintiff's employment.
33. As fully detailed herein, Plaintiff was denied a reasonable accommodation and Defendant failed to engage, in good faith, in an interactive process to develop a reasonable accommodation for Plaintiff. Such reasonable accommodation would have allowed Plaintiff to perform the essential functions of her job and would not have been an undue hardship on Defendant.
34. As fully detailed herein, Plaintiff posed no direct threat to the health and safety of others in the workplace.
35. As fully detailed herein, Defendant's acts constituted discrimination against Plaintiff with respect to her compensation, terms, conditions, or privileges of employment in violation of the Americans with Disabilities Act as amended effective January 2009.
36. Defendant's acts constituted retaliation against Plaintiff with respect to her compensation, terms, conditions, or privileges of employment in violation of the Americans with Disabilities Act, as amended.

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1 37. As fully detailed herein, the actions of Defendant would have the effect of discouraging  
2 other persons with a disability from pursuing their rights under the Act.

3 38. Plaintiff suffered emotional distress, humiliation, and mental anguish.

4 39. Plaintiff suffered damages.

5 40. Plaintiff should be awarded punitive damages against Defendant to make an example of  
6 Defendant and to deter future conduct of this nature.

7  
8 41. As a result of Defendant's actions, Plaintiff has been required to hire an attorney and expend  
9 fees and costs to pursue and protect her legal rights through this action and is, therefore,  
10 entitled to recover her reasonable attorney fees and costs in an amount to be determined.

11 **SECOND CAUSE OF ACTION:**

12 **INTERFERENCE WITH PLAINTIFF'S RIGHTS**  
13 **IN VIOLATION OF THE FAMILY MEDICAL LEAVE ACT**

14 42. Plaintiff repeats and re-alleges each and every pertinent allegation contained in and every  
15 other pertinent paragraph contained in this Complaint, as if set forth fully herein.

16 43. Defendant is liable to Plaintiff for violating her rights under the FMLA.

17 44. Defendant operates in interstate commerce and has over 50 employees within a 75 mile  
18 radius of the location where Plaintiff was employed in Clark County, Nevada. Therefore,  
19 Defendant is a "covered employer," as defined at 29 U.S.C. § 2611(4), under the Family and  
20 Medical Leave Act 29 U.S.C. §§ 2611-2654 and subject to all provisions stated therein.

21 45. As a "covered employer" under the FMLA, Defendant is required to offer any "eligible  
22 employee," as defined at 29 U.S.C. § 2611(2), up to 12 weeks of leave for of absence  
23 "[b]ecause of a serious health condition that makes the employee unable to perform the  
24 functions of the position of such employee."

25  
26 46. As fully detailed herein, Plaintiff was an "eligible employee," entitled to the protections of  
27 the FMLA having worked for Defendants over 1250 hours during the preceding 12 months.  
28

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- 1 47. As fully detailed herein, Plaintiff was qualified to obtain FMLA in that she had a serious  
2 health condition.
- 3 48. As fully detailed herein, Plaintiff provided Defendant notice of her need for time off  
4 sufficient notice to trigger its responsibility to provide leave under the FMLA.
- 5 49. As fully detailed herein, Defendant denied Plaintiff FMLA benefits or interfered with FMLA  
6 rights to which she was entitled.
- 7
- 8 50. Defendant's violation of the FMLA was willful and without justification.
- 9 51. Defendant's acts were done with malice and oppression and with Defendant's conscious  
10 disregard for the rights of Plaintiff and with a certainty of knowledge that Plaintiff would be  
11 injured by Defendant's acts in violation of the FMLA.
- 12 52. Plaintiff is entitled to all remedies available under the FMLA and hereby claims entitlement  
13 to all appropriate remedies pursuant to 29 U.S.C. § 2617 (a)(1)(A) and (B) including, but not  
14 limited to, the following: money damages for lost wages and benefits and any other actual  
15 money damages caused by Defendants's violation of the FMLA; liquidated damages as  
16 provided for under the FMLA; interest as provided for under the FMLA and other law;  
17 equitable and/or injunctive relief including employment, reinstatement, and/or promotion as  
18 provided for by the FMLA and/or front pay in lieu of employment or reinstatement.
- 19
- 20 53. Plaintiff is entitled to recover reasonable attorneys' fees pursuant to 29 U.S.C. § 2617(a)(3)  
21 for having to incur costs associated with the exercise of her legal rights and remedies through  
22 this action.

23  
24 **THIRD CAUSE OF ACTION:**  
25 **RETALIATION AGAINST PLAINTIFF**  
26 **IN VIOLATION OF THE FAMILY MEDICAL LEAVE ACT**

- 27 54. Plaintiff repeats and re-alleges each and every pertinent allegation contained in and every  
28 other pertinent paragraph contained in this Complaint, as if set forth fully herein.

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- 1 55. Defendant is liable to Plaintiff for violating her rights under the FMLA.
- 2 56. Defendant operates in interstate commerce and have over 50 employees within a 75 mile
- 3 radius of the location where Plaintiff was employed in Clark County, Nevada. Therefore,
- 4 Defendant is a "covered employer," as defined at 29 U.S.C. § 2611(4), under the Family and
- 5 Medical Leave Act 29 U.S.C. §§ 2611-2654 and subject to all provisions stated therein.
- 6
- 7 57. As a "covered employer" under the FMLA, Defendant is required to offer any "eligible
- 8 employee," as defined at 29 U.S.C. § 2611(2), up to 12 weeks of leave for of absence
- 9 "[b]ecause of a serious health condition that makes the employee unable to perform the
- 10 functions of the position of such employee."
- 11 58. As fully detailed herein, Plaintiff was an "eligible employee," entitled to the protections of
- 12 the FMLA having worked for Defendant over 1250 hours during the preceding 12 months.
- 13 59. As fully detailed herein, Plaintiff was qualified to obtain FMLA in that she had a serious
- 14 health condition.
- 15 60. As fully detailed herein, Plaintiff provided sufficient notice of her need to take leave under
- 16 the FMLA.
- 17 61. As fully detailed herein, in retaliation for Plaintiff's attempt to exercise her rights under the
- 18 FMLA, Defendant terminated Plaintiff so it could avoid its obligations and in doing so
- 19 discriminated against Plaintiff and her statutory rights under the Act.
- 20
- 21 62. There was a causal link between Plaintiff's protected activity and Defendant's adverse
- 22 employment action of terminating Plaintiff's employment.
- 23 63. Defendant's violation of the FMLA was willful and without justification.
- 24
- 25 64. Defendant's acts were done with malice and oppression and with Defendant's conscious
- 26 disregard for the rights of Plaintiff and with a certainty of knowledge that Plaintiff would be
- 27 injured by Defendant's acts in violation of the FMLA.
- 28

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65. Plaintiff is entitled to all remedies available under the FMLA and hereby claims entitlement to all appropriate remedies pursuant to 29 U.S.C. § 2617 (a)(1)(A) and (B) including, but not limited to, the following: money damages for lost wages and benefits and any other actual money damages caused by Defendant's violation of the FMLA; liquidated damages as provided for under the FMLA; interest as provided for under the FMLA and other law; equitable and/or injunctive relief including employment, reinstatement, and/or promotion as provided for by the FMLA and/or front pay in lieu of employment or reinstatement.

66. Plaintiff is entitled to recover reasonable attorneys' fees pursuant to 29 U.S.C. § 2617(a)(3) for having to incur costs associated with the exercise of her legal rights and remedies through this action.

WHEREFORE, Plaintiff expressly reserves the right to amend her Complaint at or before the time of trial of the action herein to include all items of damages not yet ascertained, and demands judgment against Defendant as follows:

A. All applicable monetary relief provided for under Federal law, common law and Nevada state law including, but not limited, to the following:

1. Money damages in excess of \$10,000.00;
2. Economic damages including, but not limited to, lost wages and benefits of employment, incidental and consequential damages;
3. Liquidated damages under the Family Medical Leave Act, 29 U.S.C. § 2617 (a)(1)(A) and (B);
4. General damages including emotional distress and general economic harm;
5. Equitable and extraordinary relief in the form of an order of reinstatement, or in the alternative front pay in lieu of reinstatement;

6. Punitive and/or Exemplary damages to deter Defendant from future willful, malicious, fraudulent, and oppressive conduct of a similar nature;
7. Pre-judgment and post-judgment interest on the amounts awarded at the prevailing legal rate;
8. For an additional amount to account for any taxes Plaintiff may be called upon to pay in relation to any award made herein;
9. Reasonable attorney fees, reasonable expert witness fees, and other costs of the action pursuant to federal and state statute, agreement, or court rule;

B. A trial by jury on all issues that may be tried to a jury; and/or

C. For such other and further relief as the Court may deem just and proper.

DATED this 15<sup>th</sup> of June, 2015.

/s/ James P. Kemp

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